

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (NEWARK)
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886

Shauna Deluca, Esq. (SD-8248)

In Re:

Giomar Jimenez

***aka* Giomar Marie Ruiz,**

Debtor.

Case No.: 19-24268-RG

Chapter: 7

Hearing Date: September 10, 2019

Judge: Rosemary Gambardella

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
September 10, 2019 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i> Giomar Jimenez 127 Willet Street Passaic, NJ 07055	<i>Debtor's Attorney-</i> Carlos D Martinez Scura, Wigfield, Heyer, Stevens & Camarota, LLP 1599 Hamburg Tpk Wayne, NJ 07470	<i>Trustee-</i> Jay L. Lubetkin Rabinowitz, Lubetkin & Tully, L.L.C. 293 Eisenhower Parkway, Suite 100 Livingston, NJ 07039	<i>U.S. Trustee-</i> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
---	---	--	---

PLEASE TAKE NOTICE that on September 10, 2019, at 10:00 a.m., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper, the within creditor ("Creditor"), shall move before the Honorable Judge Rosemary Gambardella, United States Bankruptcy Judge, at 50 Walnut Street, 3rd Floor, Newark, NJ 07102, Courtroom 3E, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Martin Luther King, Jr. Federal Building 50 Walnut Street, Newark, NJ 07102**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202 Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: July 31, 2019

RAS Citron, LLC
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886
By: /s/ Shauna Deluca
Shauna Deluca, Esquire
Bar ID: SD-8248
Email: sdeluca@rasflaw.com